



SEALED

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FILED.

DATED: 4:14 pm, March 21, 2022

U.S. MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARTEL RIVERA JR.,

Defendant.

Case No. 2:22-mj- 00214-DJA

APPLICATION TO SEAL

COMES NOW the United States of America, by and through Christopher Chiou, Acting United States Attorney, and Edward G. Veronda, Assistant United States Attorney, respectfully moves this Honorable Court for an Order sealing the Complaint, this Application and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

In this case, an order sealing the Complaint would be appropriate because the Defendant has not yet been arrested, and the existence of this investigation is neither public nor known to all of the targets of the investigation, and its disclosure may alert the Defendant of a pending arrest. Accordingly, there is reason to believe that the disclosure of the information contained within the Complaint will jeopardize the investigation, including by giving the Defendant an opportunity to flee or continue flight from prosecution, or destroy or tamper with evidence.

1 The Government further submits that it is necessary for the Complaint to be sealed in light of
2 the fact that the Government Accordingly, there is reason to believe that notification of the existence
3 of complaint will seriously jeopardize the investigation, as noted previously, and would likely place
4 law enforcement at higher risk of confrontation when securing the arrest of the targets.

5 DATED this 21st day of March, 2022.

6 Respectfully submitted,
7 CHRISTOPHER CHIOU
8 United States Attorney

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10 EDWARD G. VERONDA
11 Assistant United States Attorney
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FILED.
DATED: 4:15 pm, March 21, 2022
U.S. MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARTEL RIVERA JR.,

Defendant.

Case No. 2:22-mj- 00214-DJA

ORDER TO SEAL

Based on the pending Application of the Government, and good cause appearing therefor, **IT IS HEREBY ORDERED** that the Complaint, the Government's Application and this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 21st day of March, 2022.



A handwritten signature in blue ink, appearing to read "D. Albregts", written over a horizontal line.

HONORABLE DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE